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1 2 3 4 5 6 7	SEYFARTH SHAW LLP Scott Page (State Bar No. 108515) Lisa Barnett Sween (State Bar No. 191155) Cassandra H. Carroll (State Bar No. 209123) 560 Mission Street, Suite 3100 San Francisco, California 94105 Telephone: (415) 397-2823 Facsimile: (415) 397-8549 Attorneys for Defendants KAISER FOUNDATION HOSPITALS KAISER FOUNDATION HEALTH PLAN, INC TOM LONG and MARIO CASTENADA	RICHARD W. WIEKING GLERK, U.B. DISTRICT ODUIT NORTHERN DISTRICT OF GALIFORNIA									
8	IN THE UNITED I										
9	NORTHERN DISTRICT OF CALIFORNIA										
10	THOMAS C. KELLY,	Case No. C05-1789 MHP									
11	Plaintiff,	JOINT STIPULATION AND PROPOSED ORDER TO CONTINUE									
12	v.) CASE MANAGEMENT CONFERENCE,) DEFENDANTS' MOTION TO DISMISS									
13 14	KAISER FOUNDATION HOSPITALS, INC.; KAISER FOUNDATION HEALTH PLAN, INC.; KAISER PERMANENTE GROUP.;) AND PLAINTIFF'S MOTION FOR) SANCTIONS)									
15	TOM LONG, MARIO CASTENADA, and Does 1 through 10, inclusive,))									
16	Defendants,)))									
17	Plaintiff THOMAS C. KELLY ("Plaintiff") and Defendants KAISER FOUNDATION										
18 19	HOSPITALS, KAISER FOUNDATION HEALTH PLAN, INC., TOM LONG, and MARIO										
20	CASTENADA ("Defendants"), by and through their counsel of record, hereby agree and										
21	stipulate that the Case Management Conference on this matter, along with Defendants' Motion to Dismiss and Plaintiff's Motion for Sanctions, currently scheduled for November 9, 2005, be										
22											
23	continued to November 28, 2005, or as soon thereafter as the matter may proceed before this										
24	Court.										
25	The parties make this joint request	for a continuance of the Case Management									
26	Conference and motion deadlines on the belie	ef that good cause exists for doing so because									
27	Defendants' counsel of record is not available of	on November 9, 2005, to attend the hearings, due									
28	to previously scheduled commitments.										
	JOINT STIPULATION TO CONTINUE CASE MANAG	EMENT CONEEDENCE: Core No. COS 1790 Marin									
	I CARLE BUILDER TO CONTINUE CASE WANAG	MAP									

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	1	For these reasons, the parties have stipulated to a continuance of the November 9, 2005,								
	2	Case Management Conference, as well as continuance of Defendants' Motion to Dismiss and Plaintiff's Motion for Sanctions.								
	3									
	4	A	Accordingly, the parties respectfully request the Court set the Case Management							
	5	Conference on this matter, along with Defendants' Motion to Dismiss and Plaintiff's Motion for								
	6	Sanctions, currently scheduled for November 9, 2005, to be continued to the scheduled for November 9, 2005, to								
	7	as soon t	hereafter as the	matter may proc	eed before this Court.					
	8	DATED:	November_	+ , 2005	SEYFARIH	I SHAW I	LLP			
	9	ļ	·						1	
	10		DATED: November_		By_Lisa	Barnett S	ween			
	11				Cass Anomeys 1	sandra H. or Defend				
	12				AISER FO	OUNDAT	TON HOS	HEAL:	TH	
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	18			THOMAS	C. KELL	Ÿ				
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